

From: 71445-81663462@requests.muckrock.com <71445-81663462@requests.muckrock.com>
Sent: Monday, April 08, 2019 4:55 PM
To: Karen Hall <Karen.Hall@tdcj.texas.gov>
Subject: Texas Public Information Act Request: Palantir, Texas (Texas Department of Criminal Justice)

Texas Department of Criminal Justice
Texas Public Information Act Office
P.O. Box 99
Huntsville, TX 77340
April 8, 2019
To Whom It May Concern:

Pursuant to the Texas Public Information Act, I hereby request the following records: Media reports state that the police departments around the country have made use of Palantir's software (<https://www.bloomberg.com/features/2018-palantir-peter-thiel/>). Therefore, I am requesting the following records related to Palantir:

- * Any software and algorithms developed for the implementation of the program. I'm particularly interested in any algorithms that have a public policy outcome, such as providing guidance on a policy or an assessment of an individual. More generally, I would like any software that was developed by or with, given to, used by, purchased or licensed to this agency for implementation of the above referenced program. This would include original source code, any compiled binaries (also known as executables), spreadsheets, program scripts, and other digital materials used to calculate any data in the above program. It would also include the input training data for machine learning algorithms.
- * All instructional materials, presentations and presentation materials (including recorded video and audio, PowerPoint files, prepared remarks, and slides formats), and other guidance on the use of Palantir. This includes any notes taken during meetings that discussed the use of the Palantir software, any explanations (whether internally or externally generated) of how the Palantir software works, and any other document that has been used to help explain the use of the Palantir software to any party, including internal documentation, public relations materials, and executive summaries. This also includes any description of input and output data fields that will aid in understanding the type of information that is submitted to Palantir's software, and that is produced by the Palantir software.
- * A copy of any privacy impact assessments, use policies, standard operating procedures, data retention policies, legal opinions, warranties, non-disclosure agreements, contracts, liability waivers, insurance agreements, Requests for Proposals, Responses to Requests for Proposal, Memorandums of Understanding, Letters of Interest, usage policies, or informal agreements that reference the Palantir software or otherwise guide its use or the relationship between this agency and the provider or developer of the Palantir software.
- * A copy of any funding opportunity announcements, grant applications and grantor status/progress reports, reports to legislative bodies, annual reports that mention the use of the Palantir software, as well as audit records, including but not limited to security audits of the Palantir software, misuse reports, and reports to oversight bodies.

* A copy of any validation studies conducted with respect to the program or with respect to any software or algorithms used in connection with the program, and a copy of any records pertaining to inquiries for the need of validation studies, or discussion of potential or actual validation studies. By "validation study," I mean any study designed to assess how accurate the program is in predicting what it is supposed to predict, or to assess whether the program may err in the direction of either under- or overestimating likelihoods or predicted outcomes, or may produce any results that are biased or unexpected in any way.

* Any results in a search for the term "Palantir" in police department communications—such as electronic mail and any document attachments in said electronic mail—from January 1, 2015 to present.

The requested documents will be made available to the general public, and this request is not being made for commercial purposes. It will be used in the course of reporting for Motherboard, VICE's science and technology website (www.motherboard.vice.com).

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In the event that there are fees, I would be grateful if you would inform me of the total charges in advance of fulfilling my request. I would prefer the request filled electronically, by e-mail attachment if available or CD-ROM if not.

Thank you in advance for your anticipated cooperation in this matter. I look forward to receiving your response to this request within 10 business days, as the statute requires.

Sincerely,
Caroline Haskins

Filed via MuckRock.com

E-mail (Preferred): 71445-81663462@requests.muckrock.com

Upload documents directly:

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For mailed responses, please address (see note):

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